

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

Case No. 17-BK 3283-LTS

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO.

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PROMESA Title III

As representative of

THE COMMONWEALTH  
OF PUERTO RICO

This filing relates to Commonwealth, HTA,  
ERS.

(Jointly Administered)

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**URGENT MOTION REQUESTING EXTENSION OF TIME TO FILE CLAIMANT  
RESPONSE FORM TO MOTION FOR SEEKING TO DESALLOW CLAIM NO. 32046  
Docket 12,864**

TO THE HONORABLE COURT:

COMES NOW claimant Milton Portalatin Pérez, who, through the undersigned legal counsel, very respectfully informs, states, and request:

- 1) The Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority (“HTA”) and Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), the Debtor, The One Hundred Ninety-Second Omnibus Objection (Non-Substantive) Of The Commonwealth Of Puerto Rico, Puerto Rico Highways And Transportation Authority, And Employees Retirement System Of The Government Of The Commonwealth Of Puerto Rico

To Miscellaneous Deficient Claims our client Claim No. 32,046 on April 17<sup>th</sup> by mail. (Docket No. 12,864)

- 2) Debtor have to complete the Claimant Response (exhibit e to the motion).
- 3) Debtor tried to file this motion personally but the Bankruptcy Court of Puerto Rico is closed at the moment and the attorneys for Debtor are still closed to the public and he had to request the appearing attorney to represent him to be able to file the instant motion and the Claimant response.
- 4) To responsible replay this objection filled by the Debtor, the appearing creditor needs to collect information, documents and evidence that are out of reach at the moment because Covid-19 Emergency and restriction of operations of business in Puerto Rico.
- 5) In accordance with the previously alleged, we request an extension of thirty (30) days to be able to complete the Claimant form with all documentation.

**WHEREFORE**, the appearing party respectfully requests that this Court take notice of this motion and take any other additional relieve deemed appropriate.

**I HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification, upon information and belief, of such filing to counsel of record at their electronic address of record.

**/s/Damaris Quiñones-Vargas**  
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